

REMARKS

Applicants respectfully request reconsideration and allowance of claims 1-11 and 110-140 that are pending in the above-identified patent application. Applicants have amended claims 1 and 110. No new matter has been added by these amendments.

Applicants repeat that claims 1 and 110 are generic and read on all species identified by the Examiner in the June 16, 2003 Office Action, and that claims 1 and 110 remain generic after the amendments herein.

In numbered parts 2-12 of the Office Action, the Examiner rejected claims 1-11 and 110-140 under 35 U.S.C. § 103(a) as being unpatentable over the *Chiraz*, *MacInnis*, and *Bright* references. Applicants respectfully traverse the Examiner's rejection.

The primary reference upon which the Examiner relies is the *Chiraz* reference. Applicants submit that the *Chiraz* reference (even if modified in accordance with the teachings of the *MacInnis* and *Bright* references) does not disclose or suggest the features of independent claims 1 and 110 of the instant application. Independent claims 1 and 110 require that an image is produced for covering an image area of a single display. In order to clarify that claims 1 and 110 were directed towards producing an image for covering but one display, such claims were amended to recite "a single display." Applicants note that this amendment does not narrow claims 1 or 110 inasmuch as the amendment merely clarifies a limitation that was already present. If the Examiner disagrees with this position, Applicants request that he indicate such on the record.

In contrast, the *Chiraz* reference is directed toward a multiple display system in which multiple frame buffers are controlled and addressed such that a single, high resolution, logical frame buffer is obtained to render respective images for the multiple displays. (Col. 5, lns. 29-37.) Indeed, every one of the embodiments disclosed in the *Chiraz* reference indicates that multiple displays are contemplated. For example, FIG. 1 shows an image displayed using four standard resolution display devices. (Col. 11, lns. 9-12.) FIG. 10 illustrates how a physical memory is used to achieve four video memories to provide an image for multiple displays. (Col. 14, ln. 55 - col. 15, ln. 5.) Further, FIGS. 14, 15, 21A-C, 22, 23A, 24A, 24B, 24C, 29A-D, 31A-B, 32A-C, and 33A-B, and the descriptions thereof all disclose that multiple display devices are employed to display the image from the "logical frame buffer."

In accordance with the embodiments of the present invention recited in independent claims 1 and 110 of the instant application, however, the production of an image for a single display device is contemplated. This clear distinction over the *Chiraz* reference alone is enough to justify the allowance of claims 1, 110, and the claims dependent thereon.

There is, however, a second and independent reason that the cited combination of the *Chiraz*, *MacInnis*, and *Bright* references fail to disclose or suggest the invention as recited in independent claims 1 and 110. Indeed, although Applicants agree with the Examiner that the *Chiraz* reference does not disclose "one or more merger units operable to synchronously receive the frame image data from the respective local frame buffers and to synchronously produce combined frame image data based thereon," Applicants disagree with the

Examiner that the *MacInnis* reference teaches these features. Indeed, Applicants disagree with the Examiner when he states that "MacInnis teaches . . . one or more merge units operable to synchronously receive the frame image data . . ." The *MacInnis* reference discloses that graphics data from multiple graphics layers (or windows) are blended in order to produce a graphics image. However, there is no disclosure in the *MacInnis* reference of a plurality of graphics processors, each being operable to render frame image data into respective local frame buffers. Instead, the *MacInnis* reference discloses that graphics data is organized into logical windows, where each window consists of image content from text and graphics patterns, GIF images, JPEG images, MPEG videos, three-dimensional graphics, cursors or pointers . . . There is no mention of a plurality of graphics processors to produce such data and storing same in respective frame buffers. There is simply no disclosure of the plurality of graphics processors and respective local frame buffers as claimed. Thus, while the *MacInnis* reference does disclose the blending of image content from two or more logical windows, it does not disclose that such is performed by synchronously receiving frame image data from respective local frame buffers of respective graphics processors.

In view of the foregoing, it cannot be said that the combined teachings of the *Chiraz* and *MacInnis* references render the invention as recited in claims 1 and 110 obvious. Indeed, such combination would not suggest the production of an image for a single display device, and would not suggest to synchronously receive frame image data from respective local frame buffers and to synchronously produce combined frame image data based thereon. Applicants submit that the citation

Application No.: 09/815,781

Docket No.: SCEI 3.0-041


of the *Bright* reference fails to remedy the deficiencies of *Chiraz* and *MacInnis* references discussed hereinabove. Accordingly, Applicants submit that claims 1, 110, and the claims dependent thereon are patentable over the cited combination.

In view of the foregoing, Applicants submit that the instant claims are in condition for allowance. Early and favorable action is earnestly solicited. If, however, for any reason the Examiner does not believe that such action can be taken at this time, it is respectfully requested that he telephone Applicants' attorney at (908) 654-5000 in order to overcome any additional objections which he might have.

If there are any additional charges in connection with this requested amendment, the Examiner is authorized to charge Deposit Account No. 12-1095 therefor.

Dated: November 21, 2003

Respectfully submitted,

By 

Matthew B. Dernier

Registration No.: 40,989

LERNER, DAVID, LITTENBERG,

KRUMHOLZ & MENTLIK, LLP

600 South Avenue West

Westfield, New Jersey 07090

(908) 654-5000

Attorney for Applicant